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February 27, 2018

**VIA ECF & FEDEX**

The Honorable Karen M. Williams, U.S.M.J.  
United States District Court  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

Re: *Invensas Bonding Technologies, Inc. v. Samsung Electronics America, Inc., et al.*  
Civil Action No. 17-7609 (RMB)(KMW)

Dear Judge Williams:

This firm, together with O'Melveny & Myers LLP, represents defendants Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. in the above-referenced action. We write on behalf of all parties.

Following Your Honor's entry of the Scheduling Order in this case (D.I. 28), we noticed certain aspects of the schedule reflected in that Order did not appear to reflect Your Honor's rulings at the Rule 16 Conference. Specifically, the chart contained in the Scheduling Order retains the headings for each parties' competing proposals and also includes references to the Preliminary Election of Prior Art protocol, which we understood the Court had declined to adopt. In addition, the date for the exchange of claim terms for construction pursuant to L. Pat. R. 4.1(a) appears to be missing from the Scheduling Order. Accordingly, enclosed for Your Honor's consideration is a revised schedule that we believe more accurately reflects Your Honor's intentions. If the Court concurs, we respectfully request that Your Honor issue an amended Scheduling Order including the enclosed revised schedule and have it entered on the docket.

Thank you for Your Honor's kind attention to this matter.

Respectfully yours,

*William C. Baton*

William C. Baton

Enclosure

cc: All Counsel (via e-mail)

<b>Event</b>	<b>Date</b>
Plaintiff's Disclosure of Asserted Claims and Infringement Contentions and accompanying production (L. Pat. R. 3.1 and 3.2)	March 8, 2018 (Th)
Joint Proposed Confidentiality Order (L. Pat. R. 2.2)	March 8, 2018 (Th)
Defendants' Non-Infringement Contentions and Responses pursuant to L. Pat. R. 3.2A	April 23, 2018 (M)
Defendants' Invalidity Contentions pursuant to L. Pat. R. 3.3 (and accompanying production under L. Pat. R. 3.4)	April 23, 2018 (M)
Responses to Invalidity Contentions under L. Pat. R. 3.4A	May 7, 2018 (M)
Exchange of Claim Terms For Construction (L. Pat. R. 4.1(a)) and thereafter meet and confer to narrow issues	May 21, 2018 (M)
<b>Telephone Status Conference with the Court</b>	<b>June 4, 2018 at 10:30am. Counsel for plaintiff shall initiate the call.</b>
Exchange of Proposed Claim Term Constructions and Extrinsic Evidence (L. Pat. R. 4.2(a)-(b)) and thereafter meet and confer to narrow issues	June 11, 2018 (M)
Exchange of evidence in opposition to other party's proposed construction ((L. Pat. R. 4.2(c))	June 25, 2018 (M)
Joint Claim Construction and Prehearing Statement (L. Pat. R. 4.3)	July 11, 2018 (W)
Substantial Completion of Document Production	July 13, 2018 (F)
Deadline for Motions for Leave to Amend the Pleadings or to Join Other Parties	July 20, 2018 (F)

Event	Date
Completion of fact discovery relating to claim construction (L. Pat. R. 4.4)	August 10, 2018 (F)
Opening <i>Markman</i> submissions (L. Pat. R. 4.5(a))	August 27, 2018 (M)
Completion of Expert Discovery Relating to Opening <i>Markman</i> (L. Pat. R. 4.5(b))	September 26, 2018 (W)
Responsive <i>Markman</i> submissions (L. Pat. R. 4.5(c))	October 26, 2018 (F)
<i>Markman</i> Hearing Date	November 27, 2018

So Ordered this 1st day  
of March, 2018  
  
KAREN M. WILLIAMS  
UNITED STATES MAGISTRATE JUDGE